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*Attorneys for Plaintiff and the Proposed Class in
Farnsworth v. Meta Platforms, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, *et al.*

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 3:23-cv-03417-VC

**DECLARATION OF DANIEL M.
HUTCHINSON IN SUPPORT OF
UNOPPOSED ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CASES SHOULD BE RELATED
PURSUANT TO CIVIL LOCAL RULES 3-
12 AND 7-11**

1 I, Daniel M. Hutchinson, declare:

2 1. I am a partner with the law firm Lief Cabraser Heimann & Bernstein,
3 LLP, counsel of record for Plaintiffs in *Farnsworth et al., v. Meta Platforms, Inc.*, 3:24-cv-06893-
4 AMO (N.D. Cal.) (the “*Farnsworth* Plaintiffs”). I am admitted to practice before this Court and
5 am a member in good standing of the bar of the State of California; the United States District
6 Court for the Central, Northern, and Southern Districts of California; the United States District
7 Court for the Northern District of Illinois; the United States District Court for the Eastern District
8 of Wisconsin; and the U.S. Courts of Appeals for the First, Second, Third, Fourth, Seventh,
9 Ninth, and Eleventh Circuits.

10 2. Pursuant to Civil Local Rule 7-11, I submit this declaration in support of
11 the *Farnsworth* Plaintiffs’ Unopposed Administrative Motion to Consider Whether Cases Should
12 Be Related under Civil Local Rules 3-12 and 7-11 (the “Motion”). If called as a witness, I could
13 and would testify competently to the matters stated herein.

14 3. Attached as **Exhibit 1** is a true and correct copy of the Complaint filed on
15 October 1, 2024, in *Farnsworth et al., v. Meta Platforms, Inc.*, 3:24-cv-06893-AMO (N.D. Cal.).
16 ECF No. 1.

17 4. Prior to filing this Motion, on October 2, 2024, my firm contacted counsel
18 for all parties in *Kadrey et al., v. Meta Platforms, Inc.*, 3:23-cv-03417-VC (N.D. Cal.) (“*Kadrey*”)
19 to inform them that *Farnsworth* Plaintiffs would file this Motion. On October 3, 2024, I sent a
20 copy of the Motion to Defendant Meta Platforms, Inc.’s counsel (“Meta’s counsel”). Meta’s
21 counsel reviewed the Motion and stated that—while Meta does not agree with the
22 characterizations in the Motion—Meta would not oppose relating the cases. Counsel for Plaintiffs
23 in *Kadrey* do not oppose this Motion.

1 I declare under penalty of perjury that the forgoing is true and correct. Executed in San
2 Francisco, California, this 3rd day of October 2024.

3 /s/ Daniel M. Hutchinson

4 Daniel M. Hutchinson

5 (State Bar No. 239458)

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